

EXHIBIT 16

Victims seeking sex offender's millions see painful pasts used against them

P palmbeachpost.com/story/news/crime/2010/01/24/victims-seeking-sex-offender-s/7280436007

CRIME

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One was in a Hobe Sound trailer when her father beat his girlfriend's 8-year-old son to death. Another watched her boyfriend kill himself. Still another was molested at 12 by her best friend's brother and was raped again three years later.

Now their violent, traumatic and just plain sad lives are being used against them.

Attorneys for multimillionaire Jeffrey Epstein are dredging up the most intimate details of the lives of more than a dozen women who are seeking millions from the sex offender. The women claim he lured them to his Palm Beach mansion for sexually charged massages when some were as young as 14.

In court papers, Epstein's attorneys scoff at the women's claims that they were traumatized after being paid \$200 to give Epstein, now 57, massages that, for most, led to sex. If they were so traumatized, his attorneys ask, why did they return 10, 20, 50 or as many as 100 times? If they were so traumatized, why did they take advantage of Epstein's offer to double their money by getting dozens and dozens of other girls to participate?

Nothing is off limits, attorney Robert Critton has argued in court papers. To keep the women's hands off his client's money, he is seeking to prove that they had deep psychological problems before they claim they were introduced to Epstein .

"Because Epstein purportedly has 'lots of money,' they claim his actions caused their horrific damages," Critton wrote, asking a judge to force the women to answer his questions. "Yet performing in the 'Champagne Room,' dancing at strip clubs and prostituting themselves ... has no relevance to their claimed damages in this case? Are (they) and their attorneys seriously making this argument?"

When given a chance to question the women, his tactics have been bare-knuckle.

"I want you to tell the ladies and gentlemen of the jury whether or not aborting three fetuses is more traumatic than giving a man a massage in the nude," attorney Mark Luttier, Critton's partner, asked one of the women in a recent deposition.

Reluctantly, the woman, who, like most of the others filed a civil suit using a pseudonym, admitted the abortions were worse.

A controversial non-prosecution agreement Epstein signed to avoid federal charges was to protect the women from such intrusive questioning.

"You have a number of girls who were very hesitant about even speaking to authorities about this because of the trauma that they have suffered and about the embarrassment," Assistant U.S. Attorney Ann Marie Villafana, who crafted the deal, told a federal judge. "So we did through the non-prosecution agreement tried to protect their rights while also protecting their privacy."

'Hyper-sexualized' women

After the feds promised to stop their investigation, Epstein agreed to plead guilty to two state charges: procuring a minor for prostitution and soliciting prostitution. He was released from the Palm Beach County Jail in July after serving 13 months of an 18-month sentence. As part of the deal, he agreed not to contest the accusations in the civil lawsuits. But, he can argue that the women don't deserve the millions they are seeking.

That gave Critton the opening to question the women about the beatings some suffered at the hands of their fathers, stepfathers and boyfriends, their drug use, arrests, academic failures and their sex lives.

For some, the questions were too much. Four of the 17 women who filed lawsuits have settled for undisclosed amounts.

Adam Horowitz, who represents six of the women, said it's not surprising that some would become strippers or prostitutes after their experiences with Epstein. "These women were hyper-sexualized at very young ages," he said. That they came from troubled, or even violent, homes only made them more vulnerable, he said.

In a deposition, a woman identified as L.M. said she began working as a call girl and stripper after her experience with Epstein, whom she met at age 15. She said she left the "bunny ranch" business in June when she was 21.

"I've been seeing psychiatrists and kind of realized that this life isn't for me," she said.

If she was so traumatized by Epstein, Critton questions why she went to his house more than 100 times and solicited more than 50 other girls for him. Also, in a statement to police, she described Epstein as "an awesome man" who sent gifts to her baby shower.

However, not all of the women have sordid pasts, according to court records. In her lawsuit, one "Jane Doe" said she was working a \$9-an-hour job at Mar-a-Lago when she was recruited at age 15. For four years, Epstein used her as his sex slave, taking her around the world on his private jet before she fled to Australia where she now lives, says the lawsuit filed by Miami attorney Robert Josefsberg.

Before she escaped, she, along with young girls from various foreign countries, were forced to service Epstein. She was also sexually exploited by his friends, including "royalty, politicians, scientists and businessmen," says the suit. It was settled last month.

Epstein pleads the Fifth

During depositions, Epstein has refused to answer questions about such allegations, claiming his Fifth Amendment right against self-incrimination. He has refused to talk about his holdings — a 51,000-square-foot mansion in Manhattan, a 7,500-acre ranch in New Mexico and a 70-acre island in the Virgin Islands. He is mum about his background as a high school math teacher who worked for Bear Stearns before starting his own financial management company. He is equally taciturn about trips he took with former President Clinton, Britain's Prince Andrew and actors Kevin Spacey and Chris Tucker.

Deposition exchanges have been nasty.

"Would you agree with the description that you are a pervert?" asked attorney Spencer Kuvin. Epstein took the Fifth.

"Do you believe you're a sexual deviant?" Kuvin asked. Epstein said no.

In most cases, Critton has instructed Epstein not to answer. At the same time, attorneys representing the victims have instructed their clients not to speak about some matters.

Although a magistrate who is overseeing the federal cases warned Critton not to be abusive, she said Epstein has a right to probe the women's backgrounds. Critton said such questioning is only fair.

" (Their) damages will be substantially reduced due to several preexisting and diagnosed conditions for which they now attempt to pawn off on Epstein in an effort to increase their damages."